SCHROTH & SCHROTH
ROBERT E. SCHROTH, JR, ESQ. (SBN 212936)
2044 First Avenue, Suite 200
San Diego, California 92101
Telephone: (619) 233-7521
Facsimile: (619) 233-4516

Attorney for Material Witnesses, Oscar Armando Gonzales-Lorenzana, Jesus Tovar-Venegas, and Vanessa Mavel-Martinez.

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(Hon. Peter C. Lewis)

UNITED STATES OF AMERICA, Plaintiff, vs. REYNALDO SANCHEZ-DIAZ, Defendant.	Criminal Case No.: Magistrate Case No.: 08MJ8081 **MOTION FOR MATERIAL WITNESS VIDEOTAPED DEPOSITION** Date: February 27, 2008 Time: 10:30 a.m. Judge: Hon. Peter C. Lewis

TO UNITED STATES ATTORNEY KAREN HEWITT, ASSISTANT UNITED STATES ATTORNEY JOHN F. WIES; TO ATTORNEY JOHN ELLIS FOR REYNALDO SANCHEZ-DIAZ (1). ATTORNEY DANIEL CASILLAS FOR MICHAEL BESS-AMARILLAS (2). ATTORNEY SIRI SHETTY FOR ERIK MEDELLIN-LOPEZ (3). ATTORNEY IRA LEE PLUMMER FOR FORTINO AVILA-CANCHOLA (4). ATTORNEY MICHAEL LITTMAN FOR ALFREDO GARCIA-ORTEGA (5).

NOTICE IS HEREBY GIVEN that on February 27, 2008, at 10:30 am, or as soon thereafter as the matter may be heard, in the courtroom of Honorable Peter C. Lewis, located at 2003 W. Adams Ave, Ste 220, El Centro, California 92243, Oscar Armando Gonzales-Lorenzana, Jesus Tovar-Venegas, and Vanessa Mavel-Martinez, by and through their attorney of record**,** Robert E. Schroth, Jr., will move the court for an order authorizing the videotaped depositions of all three material witnesses.

The motion will be made on the ground that there is good cause for the order requested in that the material witnesses know of no sureties in this country who will bond them out of U.S. Marshall's custody, where they are being held at the ICJ detention facility located in El Centro, California during the pendency of this matter. Neither the interests of justice nor the convenience of the parties and witnesses will be served by requiring the material witnesses to remain in the ICJ until the matter is concluded.

DATED: February 6, 2008

SCHROTH & SCHROTH

By: s/ Robert E. Schroth, Jr.
ROBERT E. SCHROTH, JR,
Attorney for Material Witnesses